

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION

---

JANICE HILL,

PLAINTIFF,

vs.

CIVIL ACTION NO. \_\_\_\_\_

METHODIST HEALTHCARE,

DEFENDANT.

---

COMPLAINT FOR DAMAGES FOR EMPLOYMENT DISCRIMINATION

---

1. That this action is brought for discrimination in employment pursuant to Title VII of the Civil Rights Act of 1964, as codified and amended, 42 USC 2000e et seq, the Civil Rights Act of 1991, the Age Discrimination in Employment Act, 29 U.S.C. §§ 621 et seq., and the Equal Pay Act.
2. That jurisdiction is conferred upon this United States District Court by the aforementioned statutes, as well as, 28 USC 1331 and 1343.
3. That jurisdiction is conferred upon this United States District Court by the Civil Rights Act of 1991 and related claims under Tennessee law.
4. That the Equal Employment Opportunity Commission has issued a Notice of Right to Sue Letter in EEOC CHARGE NO. 490-2013-00522 dated May 12, 2014 (copy attached).

5. That the Plaintiff is a 58 year old Black female resident of Memphis, Shelby County, Tennessee.

6. That the Defendant is an entity conducting business within the jurisdiction of this court and is an employer within the meaning of the cited statutes.

7. That the Plaintiff had dutifully worked for the Defendant since June, 1981.

8. That the Plaintiff has been working as a manager since 2007.

9. That the Plaintiff discovered that she receives less pay or is in a lower pay grade than White and male managers who perform the same work as the Plaintiff and are similarly situated.

10. That the Plaintiff was advised by Pamela Williams, Chief of Operations, that Plaintiff did not receive commission payments because Plaintiff's grade is higher than those managers and supervisors who receive a commission.

11. That the Plaintiff discovered that the above information conveyed to Plaintiff by Pamela Williams, Chief of Operations, was false.

12. That the acts and omissions of the Defendant are willful.

13. That the Plaintiff has been subjected to unequal terms and conditions of her employment because of her race.

14. That the Plaintiff has been subjected to unequal terms and conditions of her employment because of her sex.

15. That the Plaintiff has been subjected to unequal terms and conditions of her employment because of her age.

16. That the Plaintiff has suffered loss of income, emotional harm, inconvenience,

loss of enjoyment of life; compensatory damages in the amount of \$500,000.00.

17. That the Defendant's acts have been willful and punitive damages should be awarded to Plaintiff in the amount of \$500,000.00.

Wherefore, Plaintiff demands judgment against the Defendant for lost wages, front pay and the value of all the employment benefits to which she would have been entitled had it not been for the Defendant's discriminatory and d i s p a r a t e treatment of Plaintiff, reasonable attorney fees and the costs of litigation and such other and appropriate relief as the court deems just.

~~Plaintiff demands a jury to hear the suitable issues in this cause.~~

/s/ *Gerald S. Green*\_\_\_\_\_

Gerald S. Green #9470

142 N. Third St., 3<sup>rd</sup> Floor

Memphis, TN 38103

Tel. 901-305-6300

Fax 901-310-4086

Email sixmillion\_643@msn.com

